

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

PLAINS ALL AMERICAN PIPELINE, L.P.,

Plaintiff,

vs.

RICHARD GEISENBERGER, in his capacity as the
Secretary of Finance for the State of Delaware;
DAVID M. GREGOR, in his capacity as the State
Escheator of the State of Delaware; AND
MICHELLE M. WHITAKER, in her capacity as the
Audit Manager for the State of Delaware,

Defendants.

Civil Action No. 15-cv-00468-RGA

RULE 41 STIPULATION OF DISMISSAL

Plaintiff Plains All-American Pipeline, L.P. (“Plains”) has opted to convert the pending examination of its compliance with the State of Delaware’s unclaimed property laws to a review under the Secretary of State’s unclaimed property voluntary disclosure program, pursuant to 12 Del. C. § 1172(b). Accordingly, this dispute is moot. Plains and Defendants Richard Geisenberger, David M. Gregor, and Michelle M. Whitaker, through their respective counsel of record, hereby stipulate pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii) that the above-captioned action is dismissed without prejudice, with each party bearing its own attorneys’ fees and costs.

Dated: December 21, 2017

/s/ Colin R. Robinson

Bradford J. Sandler, Esq. (No. 4142)
Colin R. Robinson, Esq. (No. 5524)
Pachulski Stang Ziehl & Jones LLP
919 North Market Street, 17th Floor
Wilmington, Delaware 19801
Tel: (302) 652-4100
Email: bsandler@pszjlaw.com
crobinson@pszjlaw.com

Phillip B. Dye (*pro hac vice*)
Deborah C. Milner (*pro hac vice*)
Brock Skelley (*pro hac vice*)
Vinson & Elkins LLP
1001 Fannin Street, Suite 2500
Houston, TX 77002-6760
Tel: (713) 758-2381
Facsimile: (713) 615-5040
Email: pdye@velaw.com
cmilner@velaw.com
bskelley@velaw.com

*Counsel for Plains All American
Pipeline, L.P.*

Respectfully submitted,

/s/ Caroline Lee Cross

Caroline Lee Cross (No. 3489)
Edward K. Black (No. 5302)
Jennifer R. Noel (No. 3987)
Deputy Attorney General
Delaware Department of Justice
Carvel State Office Building
820 North French Street, SLC C600
Wilmington, DE 19801
Tel: (302) 577-8814
Email: Caroline.Cross@state.de.us

Steven S. Rosenthal (*pro hac vice*)
J.D. Taliaferro (*pro hac vice*)
Loeb and Loeb LLP
901 New York Ave. NW
Suite 300-East
Washington, D.C. 20005

Marc S. Cohen (*pro hac vice*)
Loeb and Loeb LLP
10100 Santa Monica Blvd
Suite 2200
Los Angeles, CA 90067

*Counsel for Defendants Richard J.
Geisenberger, David M. Gregor, and
Michelle M. Whitaker*